

1 W. West Allen, Esq.  
Nevada Bar No. 5566  
2 Jonathan W. Fountain, Esq.  
Nevada Bar No. 10351  
3 HOWARD & HOWARD ATTORNEYS PLLC  
3800 Howard Hughes Pkwy., Suite 1000  
4 Las Vegas, Nevada 89169  
Tel. (702) 257-1483  
5 Email: [wwa@h2law.com](mailto:wwa@h2law.com)  
Email: [jwf@h2law.com](mailto:jwf@h2law.com)  
6

7 Ajit J. Vaidya, Esq.  
Admitted Pro Hac Vice  
KENEALY VAIDYA LLP  
8 3050 K. Street, N.W., Suite 302  
Washington, D.C. 20007  
9 Tel. (202) 748-5903  
Email: [avaidya@kviplaw.com](mailto:avaidya@kviplaw.com)  
10

*Attorneys for Defendants*  
11 *Cobra Firing Systems, LLC and*  
12 *Phantom Fireworks Showrooms, LLC*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 TITAN INTERNATIONAL  
TECHNOLOGIES, LTD.,

17 Plaintiff,

18 v.

19 COBRA FIRING SYSTEMS, LLC and  
PHANTOM FIREWORKS SHOWROOMS,  
20 LLC,

21 Defendants.  
22

Case No.: 2:24-cv-00861-CDS-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT FOR  
PATENT INFRINGEMENT  
(FIRST REQUEST)**

23 Plaintiff Titan International Technologies, LTD. ("Titan"), by and through its counsel of  
24 record, and Defendants COBRA Firing Systems, LLC ("Cobra") and Phantom Fireworks  
25 Showrooms, LLC ("Phantom") (collectively "Defendants"), by and through their counsel of  
26 record, pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate to extend the  
27 time for Defendants to file a Response to Plaintiff's First Amended Complaint for Patent  
28 Infringement (ECF No. 29) from November 11, 2024 to **November 19, 2024**.

This extension is requested in good faith and not for the purpose of delay.

DATED: this 7th day of November 2024. DATED: this 7th day of November 2024.

By: /s/ Dustun H. Holmes  
Dustun H. Holmes, Bar #12776  
MCMENEMY | HOLMES PLLC  
1645 Village Center Circle, Suite 291  
Las Vegas, Nevada 89134

By: /s/ Jonathan W. Fountain  
Jonathan W. Fountain, Esq.  
Nevada Bar No. 10351  
W. West Allen, Esq.  
Nevada Bar No. 5566

Patrick Bright, Esq. CA #68709  
(admitted pro hac vice)  
WAGNER, ANDERSON &  
BRIGHT PC  
10524 West Pico Boulevard, Suite 214  
Los Angeles, CA 90064

HOWARD & HOWARD  
ATTORNEYS PLLC  
3800 Howard Hughes Pkwy., Suite 1000  
Las Vegas, Nevada 89169

Ajit Vaidya, Esq.  
KENEALY VAIDYA LLP  
3050 K Street, NW  
Suite 302  
Washington, D.C. 20007

*Attorneys for Plaintiff*

*Attorneys for Defendants*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 11/8/2024